

DRAFT MEETING SUMMARY (v.1)

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HANFORD ADVISORY BOARD

RIVER AND PLATEAU COMMITTEE

May 9, 2002

Richland, WA

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This is only a summary of issues and actions in this meeting. It may not represent the fullness of ideas discussed or opinions given, and should not be used as a substitute for actual public involvement or public comment on any particular topic unless specifically identified as such.

The River and Plateau Committee (RAP) agreed to finalize the meeting summary from March 13 once Gordon Rogers provides his comments.

Solid Waste Environmental Impact Statement (SW-EIS)

Mike Collins, Department of Energy-Richland Operations Office (DOE-RL), discussed the Hanford Solid (Radioactive and Hazardous) Waste Environmental Impact Statement (HSW EIS). DOE plans to hold public comment meetings in late July/early August and will confirm the dates within the next two weeks. Mike told people to call him if they did not receive a postcard allowing them to request a copy of the document.

Committee Discussion

- Is there a technical analysis of the land's holding capacity for radioactive waste? Is there a document at Headquarters that analyzes the cost of disposing waste at Hanford and other sites? Mike replied that DOE has an analysis for burial grounds and a composite analysis. He agreed to check on the status of the cost analysis document.
- Why does the Performance Management Plan for the Accelerated Cleanup of the Hanford Site (PMP) state that Hanford was the only site permitted to accept mixed low-level waste? Mike replied that Nevada did not yet have a permit to accept that waste.
- The Environmental Protection Agency (EPA) is beginning a process to permit mixed low-level waste to be disposed in other parts of the country.

- Does the EIS address any projections of imported waste as a burden to the site? Mike said that DOE had gone to all generators and asked what the likelihood was that they would send the waste. DOE analyzed the total volume of waste it would receive from all generators.
- Environmental restoration (ER) waste was excluded from the Waste Management EIS and was therefore not included in the scoping of the EIS. Mike replied that the EIS did include the possibility of retrieving trans-uranic (TRU) waste out of the ER process.
- Would money be provided in advance to dig trenches for off-site waste? Mike told her that Hanford would get money from headquarters to dig trenches, and the generator would pay the incremental cost for actual disposal. The initial cost to build would be within the cleanup budget.
- There is currently a bias within DOE for on-site disposal, because it is compared with the cost of going off-site. If capacity is available at Hanford would that create a bias at other sites to ship to Hanford? Mike said it could because other sites would not have to build their own facilities. Max Power added that by being directly funded, the Waste Isolation Pilot Plant's (WIPP) connection to planning at generator sites was pretty poor. He thought the probability was fairly high that bigger sites would participate in shipping waste to Hanford. Rocky Flats has no plans for disposal of its waste, and Oak Ridge has significant problems with waste storage. It is more a question of whether waste would go to Hanford, Nevada or a commercial facility.
- Has there been much progress with negotiations and a national equity dialogue? Max replied that there had not been much progress because the administration's priorities are to accelerate on a site-by-site basis.
- Does this EIS address DOE's proposed reclassification of waste? Mike said it did not; the EIS assumes today's definitions will always be the definitions.

Regulator Perspectives

Max Power, Ecology, said the Department of Ecology was taking this EIS very seriously and would do a thorough analysis. Jessie Roberson, DOE Assistant Secretary, committed to Ecology that no mixed waste or low-level waste would be brought in from other sites until they get through this process. Ecology will be looking at the scope of this EIS relative to what is developing out of the Constraints and Challenges to Cleanup Team (C3T) process, and how the scope lines up in response to comments submitted since the scoping process five years ago. It will also look at the validity of the analyses that underlie this. Ecology is always thinking about the process of bringing mixed low-level waste burial grounds into a site-wide Resource, Conservation and Recovery Act (RCRA) permit for Hanford.

Fred Jamison, Ecology, said that the Department of Ecology would be putting together an analytic work team to evaluate assumptions associated with groundwater quality impact assessment. It will be checking for congruence between the Draft EIS (DEIS) assumptions and other Hanford site conceptual models used to evaluate air, land and water quality impacts. Ecology will assess congruence of the DEIS in the area of unit operations with planning basis documents provided to Ecology and stakeholders. It will also evaluate the basis of assumptions affecting unit design and operations and

assumptions associated with cost analyses. Max Power added that it was curious that the cost analysis had not been released. Ecology had initially permitted the waste facility on an interim status basis, pending a site-wide permit. There are no off-site generators of mixed waste that have gone through the Hanford acceptance process, except submarine compartments.

Dennis Faulk, EPA, commented that the EPA is reviewing other federal agencies NEPA documents to make sure they are adequate to assure protection of human health and the environment. EPA has authority over hazardous substances, including radionuclides. Some of the burial grounds in the Central Plateau that are in Superfund past operable units will be closed. EPA will probably close them as a system and has interest from that perspective. There is a big commitment from the agency to look at this EIS. Dennis asked people to see if this EIS is consistent with the PMP.

Pam Brown proposed that Gariann Gelston be the coordinator for issue managers for this document. Gariann and issue leaders will need to have a conference call before the next committee meeting to gear up for advice at the July Hanford Advisory Board (HAB) meeting. Pam noted that RAP would need a couple of conference calls between now and the July HAB meeting and would need a full-day committee meeting in June.

Plutonium Finishing Plant (PFP) Change Package

Larry Romine, DOE-RL, gave an overview of the PFP change package. The core negotiation team finished work on March 6 and turned the package over to legal counsel in each agency, which provided items to clarify. Larry said they hoped to get management in concurrence with the package and get it out for review the week of May 20th. DOE initiated contact with the tribes to brief them. The public comment period will begin around May 15 and last for 45 days.

Pam Brown asked Dirk Dunning, issue manager, to let the committee know if he finds something surprising or controversial in the package. If so, RAP will request an extension to the comment period in order to provide July advice. Penny Mabie noted that the planned 45-day comment period would end on July 8, two days before the HAB meeting. Yvonne Sherman, DOE-RL, agreed to discuss this with management and see if they would allow a 48-day comment period.

Pam noted that the change package will be sent to the whole committee.

Draft Performance Management Plan Follow-Up

The committee discussed the PMP and what was heard at the Committee of the Whole Meeting the day before.

Dirk Dunning said he was doubtful that DOE would make this year's milestone on the spent fuel project, although there is a good chance they will make latter milestones. There is a huge disconnect with 618-10 & -11 if WIPP plans to close by 2016. That

would mean 618 cleanup would have to begin in the next couple years. There is also a problem with the Plutonium Finishing Plant (PFP) being ready for WIPP. DOE is talking about filling in canyons with waste and burying them in place. This could be a disconnect if the plan is to put a lot of waste there as opposed to building more Environmental Restoration Disposal Facility (ERDF) cells. If the risks associated with other burial grounds are great enough to require that the grounds be exhumed and processed to some degree, they would have to go through an analysis of TRU waste.

The committee brainstormed specific areas of concern or questions on the PMP.

- Resource loading and whether everything could be done at the same time are of concern. The Tri-Cities is already stressed with increased population. There are also potential problems with serious changes in craft mixes.
- If WIPP has truly submitted an acceleration plan that has them closing in 2016, then here are serious disconnects. Dennis added that the remote-handled TRU facility would also be key. Another disconnect with WIPP was if leaked waste or residual waste is reclassified as TRU waste it may not meet the timeframes needed for WIPP. Dennis Faulk said that WIPP will have to stay open until it is done with TRU waste around the complex.
- Why should Hanford take mixed low-level waste from off-site when Nevada has not been permitted? Why should Hanford take TRU waste from off-site when there is no guarantee it would then be taken at WIPP or Savannah River?
- Waste sent to Hanford from other sites to be treated at Associated Technology Group (ATG) might become Hanford waste. We need confirmation on that issue.
- Remote-handled TRU from off-site could end up having a higher priority than Tri Party Agreement (TPA)-required Hanford cleanup work. The PMP discusses small generator sites sending their TRU to Hanford to be characterized. Why would remote-handled waste come to Hanford, since they did not yet have the M-91 facility. Acceptance criteria are not finalized for remote TRU in New Mexico. If TRU waste is imported to Hanford, there should be an EIS to cover health and safety aspects.
- DOE planned to have engineering barriers instead of active surveillance on the site in the future. It is unrealistic to think they could walk away from the site.
- Regarding groundwater and vadose zone, the plan's approach is alright, but it needs huge integration with Headquarters and other sites. DOE had made strong commitments to groundwater. Grout has the potential to make big changes to the groundwater. Monitoring, protection and remediation are three groundwater issues.
- The PMP is one of five documents to look at closely in terms of long-term stewardship. They should look at the PMP in the context of the Hanford Long-Term Stewardship Plan and the Solid Waste EIS.
- The HAB should comment on the assumption that everything would be shipped off-site. The key to cleanup is getting TRU, spent fuel and high-level waste off-site.
- If DOE intended to use an alternate waste form to glass, they needed to make sure it would perform as well or better than glass.
- The last bullet on page 6 of the PMP talks about the Navy's disposal of decommissioned naval reactor cores in post-2035. It should read vessels, not cores, since spent fuel does not come to Hanford

- Todd Martin commented on the purpose of the PMP. Todd felt the PMP would help the site to move forward towards cleanup. He had five items of note: 1) They should thank the agencies for putting in language about being committed to using the processes and cleanup objective within the TPA to deploy the plan. The agencies should not remove that language before August 1. 2) Between now and 2012, several hundred million more dollars would be spent every single year on Hanford cleanup. HAB recognizes that this is a heavy lift. 3) HAB has always been in favor of acceleration, and it is okay to consider the plan as long as it does not cause any stupid actions today. 4) A lot of detailed work needs to be done on the technical and regulatory assumptions. 5) HAB should succinctly reiterate its expectations and assumptions about cleanup.
- DOE-RL's budget would assume moving forward on the PMP, but there is a lot of analysis that is necessary to move forward on it. Dennis replied that any plus-ups would go toward real work DOE-RL knows it can do. It will probably not be until 2004 or 2005 that plans would be in place to implement the PMP.
- Dennis thought the PMP gave the impression that the government wants minimal presence at Hanford by 2035. He suggested the committee see if the task force discussions were contradictory.

Long Term Stewardship Plan

Susan Leckband, issue manager, discussed the Hanford Long Term Stewardship (LTS) Plan. She said that Jim Daily, DOE-RL, had been their champion for the plan. Susan will put a copy of DOE's Long-Term Stewardship Study in the HAB library and noted that people could also request copies from the facilitation team. Susan asked RAP to consider the plan in conjunction with all of the other documents it is currently reviewing and make sure they are congruent. She pointed out that a feeder of the LTS is the Institutional Controls Plan (ICP), which closed for public comment a few days ago.

Jim Daily said that his primary reason for attending the meeting was to figure out what kind of public comment process RAP would recommend and to discuss timing. Keith Klein, DOE-RL, is very flexible on the public comment process. DOE is focused on getting the LTS plan in shape for an expanded, external process. It will take a few more weeks to get the LTS plan dovetailed with the PMP.

Jim said that the plan was to have near-term actions and long-term goals but not regulatory requirements. The agencies are still going through a lot of soul searching with LTS. Jim sees the LTS plan as a common sense shot across the agency to influence what happens with long-term stewardship. For example, Jessie Roberson wants smaller sites near closure to answer a lot of questions on long-term stewardship and larger sites to prove success. The problem with Hanford is that it straddles those two worlds. It seems DOE-RL should be proactive and influence future policies, which is why they are trying to get this plan out.

Committee Discussion

- The Exposure Scenario Task Force had discussed stewardship, and it would be nice to use that feedback in this effort.
- Susan Leckband reported that at her table at the Task Force meeting, they had determined that there should be human presence in the 200 Area for the length of time that there are contaminants. There was concern that knowledge would be lost if the human population went away.

Susan suggested that the task force have a third workshop, and that they have at least two public meetings. Jim Daily said that he anticipated having the document at the end of June. Dennis Faulk asked if it would be a problem to hold the workshop in September, and Jim said that it would not. Keith Klein had said to take the time to get it right.

Susan was concerned the LTS issue was so fragmented that it would not be heard unless the HAB and stakeholders gave their input into the document. Jim agreed that DOE might begin to lose recognition that land utilization and transfer is one key issue of long-term stewardship if the HAB did not influence DOE to look at this from an integrated system perspective.

What is DOE-RL's interaction with the Department of Fish and Wildlife? Jim replied that Fish and Wildlife had participated in the first two workshops and the process around the earlier annotated outline. It had been engaged as part of the working group, but the handoff process is now open territory. Harold Heacock said that he is on the advisory board for Fish and Wildlife, and it is not addressing any takeover of lands as they are declared surplus. Fish and Wildlife's policy is that it will not get in the business of managing contaminated areas.

Regulator Perspectives

- Dennis Faulk said that Susan Leckband thought this would be a driving document. He asked RAP if it thought this would or would not be a driving document, and why. Dennis said he was still struggling with how the LTS plan would affect business on the site.
- Max Power commented that long-term stewardship depended on decisions being made complex-wide. How they look at decisions about waste disposal, tank closure and records of decision on individual operable units is a direction function of their level of comfort about some of the stewardship issues that are in place. Max felt it was important to look at stewardship now.

Jim Daily agreed to facilitate the next workshop as he had done in the past. Penny suggested the workshop be attached to the September committee week.

The committee asked Jim to send it the draft document in June, so it can provide feedback to senior management. Susan Leckband agreed to craft advice by May 21 about delaying the release of the long-term stewardship plan in order to provide adequate time for stakeholder review and participation.

Committee Leadership Selection

Penny Mabie recapped the RAP slate for committee leadership. Pam Brown and Gariann Gelston were nominated for chair, and Susan Leckband and Gariann were nominated for vice chair. Gariann declined the chair and vice chair nominations. She would still like to remain active, however, which is why she took on the issue manager leadership role with the Solid Waste EIS. The committee agreed by consensus to keep Pam as chair and Susan as vice chair.

Committee Business

The RAP committee made changes to its work planning table. Penny Mabie said that she would bring a reformatted table, similar to the one for the Tank Waste Committee, to the next meeting.

Doug Huston passed out draft advice from the exposure scenario task force and asked the committee to give comments to Doug or Lynn Lefkoff.

Pam Brown said that she would like to have a presentation on new soil remediation strategies at a future committee meeting.

Handouts

- RAP Draft Meeting Agenda; May 9, 2002.
- RAP Work Planning Table; October 17, 2001.
- HAB Exposure Scenarios Task Force – Draft Advice; May 9, 2002.
- Hanford Solid (Radioactive and Hazardous) Waste Environmental Impact Statement (HSW-EIS), Michael Collins, DOE-RL; May 9, 2002.

Attachment

Flip Chart notes from the Performance Management Plan discussion

Attendees

HAB Members and Alternates

Jim Curdy	Pam Brown	Dirk Dunning
Gariann Gelston	Harold Heacock	Doug Huston
George Jansen Jr.	Dave Johnson	Paige Knight
Susan Leckband	Todd Martin	Maynard Plahuta
Gordon Rogers	Keith Smith	Charles Weems

Others

Michael Collins, DOE-RL	Rick Bond, Ecology	Nancy Myers, BHI
Joel Hebdon, DOE-RL	Fred Jamison, Ecology	Penny Mabie, EnviroIssues
Larry Romine, DOE-RL	Max Power, Ecology	Natalie Renner, EnviroIssues
Yvonne Sherman, DOE-RL	Dave Bartus, EPA	Barb Wise, Fluor Hanford

	Craig Cameron, EPA	John Stanfill, NPT
	Dennis Faulk, EPA	
	Larry Gadbois, EPA	

Flip Chart Notes

- WIPP acceleration – disconnect with 618-10 and –11
- RH-TRU facility – essential for accelerated commitments
- MLLW – why accept it when Nevada is not yet permitted
- Why take RH-TRU from off-site when no guarantee WIPP or Savannah River will take it
- RH-TRU from off-site – if comes here and gets characterized, then doesn't meet WIPP criteria – then what?
- Leaked waste or residual tank waste has potential to become TRU – disconnect with WIPP
- If importing TRU waste – should be an EIS to look at health/safety issues – cumulative impacts
- Is SW-EIS going to cover any of the health and safety issues associated with importation – i.e., transportation? No.
- Concept is good – needs a huge amount of integration with HQ and other sites. Needs a lot more detailed and well-integrated work.
- Need groundwater “where's the meat” statement. Monitoring, protection and remediation – need details in August 1 version
- Vadose zone – stuff in there
- IN the context of Hanford LTS plan – needs to be analyzed and make sure there is consistency among all plans, etc. Questions to come – stewardship should begin now. Stewardship needs to be factored in when making cleanup decisions
- There must be a commitment that stuff will be shipped off-site (HLW, TRU, SNF)
- Alternative waste forms – need to be analyzed for long term disposal at Hanford
- Resource loading – need more details, i.e., craft mixes, tri-cities impacts, etc.

